

EXHIBIT A



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VIA ELECTRONIC MAIL

To All Counsel of Record

Re: State of RI v. Purdue Pharma, L.P., et al., C.A. No. PC-2018-4555
Document Production USDOJ

Dear Counsel,

The State has been working with USDOJ to facilitate production of documents that could include highly sensitive DEA information and reveal, for example, confidential informants, undercover officers, or other investigative tools or strategies. To that end, USDOJ has agreed that the State may produce such documents with a “CONFIDENTIAL – ATTORNEYS EYES ONLY (“AEO”)” designation. This goes beyond the types of AEO information described in the protective order, but this designation was used in the MDL to protect this obviously sensitive law enforcement information. To the extent that any party wants to use specific documents in depositions with non-recipients or in filings, USDOJ will review the documents for de-designations and redactions. However, this limits the universe of documents requiring line-by-line review and allows the State to produce these documents to Defendants promptly.

Please advise me as soon as possible whether using such an AEO designation is acceptable to your clients. In alternative, if any Defendant has questions or concerns, or if we need to raise this with the Court, please contact me as soon as possible so that this issue will not delay production of these documents.

Very truly yours,

Vincent L. Greene
VLG/